

September 28, 2009

**BUSINESS CONFIDENTIALITY CLAIM ASSERTED: THIS LETTER AND ALL ENCLOSURES ARE COMPANY CONFIDENTIAL<sup>1</sup>**

**Via U.S. Mail**

Linda Ketellapper, SFD-7-5  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Response to Supplemental 104(e) Request for Information – Omega Superfund Site;  
Former McKesson Chemical facility, 9005 Sorensen Avenue, Santa Fe Springs, CA

Dear Ms. Ketellapper:

I am responding to the Environmental Protection Agency's ("EPA") supplemental request for information dated September 11, 2009 ("McKesson Santa Fe Springs Information Request"), directed to McKesson Corporation ("McKesson").

**GENERAL OBJECTIONS TO EPA REQUEST FOR INFORMATION**

McKesson objects to EPA's request for information on the following grounds, in addition to any other grounds set forth in this letter or otherwise available under law.

1. To the extent EPA seeks information from McKesson or McKesson Chemical Company ("MCC") that does not relate either to hazardous substances that have come to be located at the Site, or to McKesson's or MCC's ability to pay for a cleanup, EPA's requests are beyond EPA's statutory authority pursuant to CERCLA
2. To the extent these requests may be construed to seek or documents prepared by or for the EPA, or already in the possession of EPA, these requests are unduly burdensome.

---

<sup>1</sup> McKesson Corporation, formerly doing business as McKesson Chemical Company, hereby asserts a claim of business confidentiality with regard to this letter and all information submitted to it, pursuant to 40 C.F.R. § 2.203. McKesson Corporation requests that EPA hold this letter and all accompanying information as strictly confidential and not subject to disclosure.

3. To the extent these requests may be construed to seek information or documents obtained from publicly available databases, these requests are unduly burdensome.
4. EPA has no statutory authority to request the submission of information that is protected from disclosure by statutory or common law privileges.

**RESPONSES TO EPA'S SPECIFIC REQUEST:**

REQUEST: Please provide complete copies, including all attachments and appendices, of each of the documents enumerated below.

1. All volumes of the Final Harding Lawson Remedial Investigation (including all attachments)
2. Investigation of Solvent Storage Area (including analytical data), dated June 24, 1984
3. Investigation of Solvent Storage Area (including analytical data), dated March 1986
4. McKesson Intra Company Correspondence: "June Status Report Santa Fe Springs Soil Sampling", dated July 5, 1984
5. GC/MS Analysis, dated August 22, 1984
6. Analytical Data (contained in Harding Lawson June 25, 1993 RI), dated October 1984
7. McKesson Chemical Group letter to DOHS including analytical results from McKesson Environmental Services investigation, dated October 25, 1984
8. McKesson Chemical Group letter to DOHS including analytical results from McKesson Environmental Services investigation, dated December 6, 1984
9. McKesson Intra Company Correspondence: "Santa Fe Springs – PRF Site Inspection/PVC Pipe Leak", dated March 19, 1985
10. Investigation of Solvent Storage Area – including analytical data, dated March 1986
11. McKesson Intra Company Correspondence: "Analytical Results, Santa Fe Springs", dated May 1, 1986

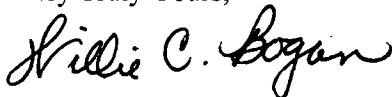
12. Letter to DOHS regarding "Site Investigation Results", dated May 21, 1986
13. Letter to DOHS including analytical results, dated April 11, 1989
14. HKLA Summary of Results and Proposed Additional Work, dated December 4, 1990
15. ENSECO report for Geometrix: Analysis of Volatile Organics, dated August 1993
16. GeoSyntec Site Characterization Report, dated October 31, 2001

RESPONSE: Subject to, and without waiving the foregoing objections, McKesson responds as follows:

Please see the enclosed CD which contains attachments 1 through 16 to this letter.<sup>2</sup> Upon request, McKesson will provide USEPA with hard copies of these documents.

If, after reviewing this information, USEPA requires further information or documentation regarding this response, McKesson is willing to discuss with USEPA any remaining questions or issues and respond with further information or documentation to resolve those questions or issues.

Very Truly Yours,



Willie C. Bogan  
Associate General Counsel  
and Secretary

---

<sup>2</sup> Per a September 16, 2009 phone conversation with the USEPA's Lynda Deschambault, McKesson was informed that providing the documentation to USEPA in an electronic format would satisfy USEPA's document request.

## **Index to Attachments**

- Attachment 1a: June 25, 1992 Remedial Investigation, McKesson Corporation Property, 9005 Sorensen Avenue, Santa Fe Springs, California, by Harding Lawson Associates, Volume I – Remedial Investigation Report, Tables, Plates (Note: Attached Plate 3 could not be located).
- Attachment 1b: June 25, 1992 Remedial Investigation, McKesson Corporation Property, 9005 Sorensen Avenue, Santa Fe Springs, California, by Harding Lawson Associates, Volume II – Appendices: A. Field Procedures; B. Boring Logs; C. CPT Data; D. Interpreted CPT Data; E. Survey Information; F. Well Development Forms; G. Well Monitoring/Sampling Forms; H. Aquifer Test Analysis.
- Attachment 1c: June 25, 1992 Remedial Investigation, McKesson Corporation Property, 9005 Sorensen Avenue, Santa Fe Springs, California, by Harding Lawson Associates, Volume III – Appendices: I. Analytical Results – Air; J. Physical Properties Test Results – Soil; K. Analytical Results – Soil.
- Attachment 1d: June 25, 1992 Remedial Investigation, McKesson Corporation Property, 9005 Sorensen Avenue, Santa Fe Springs, California, by Harding Lawson Associates, Volume IV – Appendices: L. Analytical Results – Groundwater; M. QA/QC Data Validation; N. Plume Characterization Ratio Plots.
- Attachment 1e: June 25, 1992 Remedial Investigation, McKesson Corporation Property, 9005 Sorensen Avenue, Santa Fe Springs, California, by Harding Lawson Associates, Volume V – Appendix: O. Risk Assessment.
- Attachment 2: June 26, 1984 Memorandum “Santa Fe Springs, Solvent Dike Area Assessment”; June 1984 analytical data from McKesson Environmental Services.
- Attachment 3: Investigation of Solvent Storage Area (including analytical data), dated March 1986 – as described in the May 21, 1986 letter to DOHS regarding “Site Investigation Results” (see also Attachment 11 - McKesson Intra Company Correspondence: “Analytical Results, Santa Fe Springs”, dated May 1, 1986).
- Attachment 4: McKesson Intra Company Correspondence: “June Status Report Santa Fe Springs Soil Sampling”, dated July 5, 1984.
- Attachment 5: GC/MS Analysis, dated August 22, 1984.
- Attachment 6: Analytical Data (contained in Harding Lawson June 25, 1992 RI), dated October 1984 (see also Attachment 8 - December 6, 1984 letter to DOH from McKesson enclosing results from October 1984 sampling).

- Attachment 7: McKesson Chemical Group letter to DOHS including analytical results from McKesson Environmental Services investigation, dated October 25, 1984.
- Attachment 8: McKesson Chemical Group letter to DOHS including analytical results from McKesson Environmental Services investigation, dated December 6, 1984.
- Attachment 9: McKesson Intra Company Correspondence: "Santa Fe Springs – PRF Site Inspection/PVC Pipe Leak", dated March 19, 1985.
- Attachment 10: See Attachment 3 – same document.
- Attachment 11: McKesson Intra Company Correspondence: "Analytical Results, Santa Fe Springs", dated May 1, 1986.
- Attachment 12: See Attachment 3 – same document.
- Attachment 13: Letter to DOHS including analytical results, dated April 11, 1989.
- Attachment 14: HKLA Summary of Results and Proposed Additional Work, dated December 4, 1990 (Note: Attached Plates 1 and 2 could not be located).
- Attachment 15: ENSECO report for Geomatrix: Analysis of Volatile Organics, dated August 1993.
- Attachment 16: Summary of Additional Site Characterization Activities, Former McKesson Facility, 9005 Sorensen Avenue, Santa Fe Springs, California, prepared by GeoSyntec Consultants, dated December 2001 (Note: a GeoSyntec File Index erroneously indicated the existence of an October 31, 2001 Site Characterization Report. According to GeoSyntec, the Site Characterization Report was created on October 31, 2001 and was finalized in the December 2001 Report attached).

## UNSCANNABLE MEDIA

To use the unscannable media document # 2189985  
contact the Region IX Superfund Records Center  
at 415-536-2000.